

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.)
)
JOSE SANTIAGO ET AL.)
)
Defendants)

GOVERNMENT'S OPPOSITION TO DEFENDANT MIRANDA'S
SECOND MOTION IN LIMINE (ALIAS)

Introduction

The United States, by its attorneys, Michael J. Sullivan, United States Attorney, and William F. Bloomer, Assistant U.S. Attorney, submits its Opposition to the Defendant Pedro Alberto Miranda's motion *in limine* seeking to strike from the indictment the name of Pedro Alberto Miranda and to refer to his "true name" of Carlos Colon.

For reasons set forth in the Government's Motion in Limine to Introduce Evidence of Defendants' Heroin Trafficking, filed on September 15, 2006, the evidence of the defendant's use of several aliases is relevant and admissible in this trial. Further, the government has informed counsel that it will seek to admit testimony from an experienced narcotics investigation that it is not an uncommon practice for drug dealers to employ one or more aliases in an effort to thwart detection and investigation by law enforcement. Finally, it is the government's position that the defendant's true name is "Pedro Alberto Miranda," and

that "Carlos R. Colon" is actually an alias name that the defendant employed to avoid apprehension for offenses occurring under the name Pedro Alberto Miranda in Miami, FL in 1996, and Pedro Alberto Mairanda, in New York, NY in 1997. Consequently, should the court be inclined to strike an alias from the indictment, it should be "Carlos Colon," and not "Pedro Alberto Miranda."

For the above-enunciated reasons, the government respectfully urges this Court to deny the defendant's Second Motion *in Limine*, or, in the alternative, strike the alias "Carlos Colon" from the indictment.

Respectfully submitted,

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/s/ William F. Bloomer
William F. Bloomer